

## **REMARKS/ARGUMENTS**

### **I. Status of Claims**

Claims 1, 2, 4-6, 8-10, 12, 13 and 16-18 are pending with claims 1, 8 and 12 being independent. Reconsideration and allowance of the above-identified application are respectfully requested.

### **II. Rejections under 35 U.S.C. §103 (a)**

Claims 1-2, 4-6, 8-10, 12-13 and 16-18 are rejected under 35 U.S.C. §103(a) as being unpatentable over to U.S. Patent Publication No. 2004/0120283 to Rezaiifar in view of U.S. Patent No. 6,961,578 to Silver.

As reasoned in previous Amendments filed November 20, 2006 and January 4, 2006, Rezaiifar does not disclose, teach, or suggest the following claimed subject matter:

- 1) the mobile communication system transmitting location information to the heterogeneous mobile communication system; and
- 2) the heterogeneous mobile communication system requesting the mobile communication system to page the mobile terminal according to the received information,
- 3) wherein the mobile communication system comprises a circuit-switched network and the heterogeneous mobile communication system comprises a packet-switched network.

The Examiner has not adequately addressed the Applicant's arguments in connection with the claimed subject matter quoted above. Accordingly, Applicant reserves the right to further prosecute claims incorporating the above-quoted subject matter in a continuation application.

The Examiner conceded that Rezaiifar fails to disclose a mobile terminal transmitting a location registration message to a mobile communication system,

wherein the location registration message includes information to determine whether or not a heterogeneous mobile communication system registers location information of the mobile terminal. The Examiner has therefore cited Silver as purportedly disclosing this subject matter.

However, Silver only discloses information representing the location of the mobile terminal in the packet-switched network being provided to the circuit switched network. This information, however, is not the same as the location registration message recited in claim 1 and 12 that includes information to determine whether or not a heterogeneous mobile communication system registers location information of the mobile terminal.

Similarly, because this information of Silver is information representing the location of the mobile terminal, Silver therefore fails to teach or suggest the step of determining whether the mobile terminal has been location-registered in the mobile communication system or in the heterogeneous mobile communication system with reference to pre-registered location information of the mobile terminal when paging request of the mobile terminal occurs in the heterogeneous mobile communication system, as recited in claim 8.

Furthermore, in Silver, the alleged location information is provided from Serving GPRS Support Node (SGSN) 121 to Mobile Switch Controllers (MSC)112 (see col. 7:67 – col. 8: 2), whereas according to the claimed invention, the alleged corresponding location registration information recited in claims 1 and 12 is provided from a mobile terminal to a mobile communication system.

Finally, in Silver, the alleged information is provided for the purpose of expediting the delivery of a call from a circuit-switched network to a mobile terminal camped on a packet-switched network, whereas according to the claimed invention, the alleged corresponding location registration information is provided for cross-

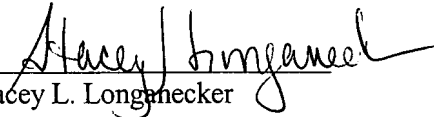
paging from a packet-switched network to a mobile terminal monitoring only a mobile communication system comprising circuit-switched network.

Consequently, Silver does not overcome the conceded deficiency of Rezaiifar. Accordingly, the Examiner has not presented a prima facie case of obviousness under 35 U.S.C. § 103 with respect to independent claims 1, 8 and 12. Accordingly, reconsideration and withdrawal of their rejections are respectfully requested. Moreover, claims 2, 4-6, 9-10, 13 and 16-18 are also believed to be allowable by virtue of their dependence from allowable claims 1, 8 and 12. Accordingly, reconsideration and withdrawal of their rejections are respectfully requested.

**III. Conclusion**

In view of the above, it is believed that the application is in condition for allowance and notice to this effect is respectfully requested. Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the telephone number indicated below.

Respectfully Submitted,

  
Stacey L. Longmeyer  
Attorney for Applicant  
Reg. No. 33,952

Roylance, Abrams, Berdo & Goodman, L.L.P.  
1300 19<sup>th</sup> Street, N.W., Suite 600  
Washington, D.C. 20036  
(202) 659-9076

Dated: April 10, 2007